

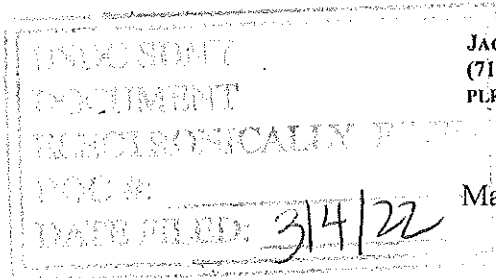
**COHEN, FRANKEL & RUGGIERO, LLP**

ATTORNEYS AT LAW  
20 VESEY STREET, SUITE 1200  
NEW YORK, NEW YORK 10007  
(212) 732-0002 • FAX (212) 293-7224

MARK I. COHEN  
PETER M. FRANKEL  
LOUIS J. RUGGIERO  
MINA KENNEDY  
GILLIAN M. FEEHAN\*

\*ADMITTED IN NJ AND PENDING ADMISSION IN NY

35-07 90<sup>TH</sup> STREET  
JACKSON HEIGHTS, NEW YORK 11372  
(718) 898-4900 • FAX (718) 898-0093  
PLEASE DO NOT REPLY TO THIS OFFICE



March 4, 2022

**VIA ECF**

The Honorable Judith C. McCarthy  
United States Magistrate Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

APPLICANT'S ATTORNEY

Hon. F. J. C. U.S.M.J.

3-4-22

Re: *United States v. Julio Alberto Taveras Abreu*  
21 Mag. 11434

Notice to  
pretrial required  
as indicated.

Dear Judge McCarthy:

Please recall that Peter Frankel, Esq., and I represent Mr. Julio Alberto Taveras Abreu in the above-referenced matter. I write to respectfully request that Your Honor modify Mr. Taveras Abreu's bail conditions: (1) to permit him to attend religious services at Iglesia Casa de Jehova in White Plains, New York, on Thursday and Saturday evenings from 7:30 p.m. until 10:30 p.m.; and (2) to permit him to travel to our Manhattan office whenever necessary for the limited purpose of meeting with counsel without needing to obtain pre-approval from Pretrial Services each time. I have consulted with A.U.S.A. Kevin Sullivan and U.S.P.T.S.O. Laura Gialanella, both of whom have no objection to this request.

Currently, Mr. Taveras Abreu is at liberty on a personal recognizance bond set before Your Honor on December 2, 2021. The terms of the bond are as follows: \$100,000 personal recognizance bond; travel restricted to the Southern and Eastern Districts of New York and, upon application to the Court, to Pennsylvania for court appearances; the surrender of all travel documents to Pretrial Services and no new applications; supervision as directed by Pretrial Services; and GPS monitoring and home detention.

If granted the requested modification, Mr. Taveras Abreu would leave his residence for the limited purpose of attending religious services at Iglesia Casa de Jehova, located at 255 Dr. Martin Luther King Jr. Boulevard, 2<sup>nd</sup> Floor, White Plains, New York 10601, on Thursdays and Saturdays from 7:30 p.m. until 10:30 p.m. Further, whenever necessary to discuss his case, Mr. Taveras Abreu will travel to our office at 20 Vesey Street, Suite 1200, New York, New York

U.S. v. Julio Alberto Taveras Abreu  
March 4, 2022  
Page 2 of 2

10007, and will notify Pretrial Services of such counsel visit at least 48-hours in advance. Thank you for your consideration of this request.

Respectfully submitted,

  
Mark I. Cohen

MIC/gmf

Cc: A.U.S.A. Kevin Sullivan (via ECF)  
U.S.P.T.S.O. Leo Barrios (via ECF)  
U.S.P.T.S.O. Laura Gialanella (via ECF)  
Mr. Julio Alberto Taveras Abreu (via email)